



PUBLIC WORKS DEPARTMENT

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April 7, 2006

Mr. Bill Brattain
California Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Comments on the Proposed General Waste Discharge Requirements for Discharges of Green Waste and Composting Within the Central Valley Region

Dear Mr. Brattain,

The City of Bakersfield would like to suggest a small addition to the proposed order, in the interest of conserving public funds while meeting the goal of the proposed order. This would be to allow green waste facilities the opportunity to avoid unnecessary capital improvements if they can demonstrate that they have no negative effect on water quality.

For the Bakersfield facility, this would be the case. The City has thirteen years of experience operating its green waste composting facility, which is perhaps one of the longest operating histories in the central valley. Equipment wash water is clarified and drained to a sanitary sewer. All of the surface water on the 97 acre facility is managed onsite. The ground water quality has been regularly monitored onsite and at the adjacent city owned waste water treatment plant and city owned farm land used for waste water irrigation. Thus far, no indication of water quality degradation has been found. It therefore seems unnecessary to construct compost pads as described in the proposed order. Of course, it would be prudent to require sufficient water quality monitoring to ensure that no future degradation occurs. The proposed order could contain a provision that, if water quality degradation begins to occur due to a green waste facility, then the facility shall follow what is now described in the proposed order. Therefore, we suggest the following text for consideration. This text would probably fit as item 26 in the proposed scope, with the current item 26 then becoming item 27:

"Discharges of Green Waste within a facility which has no offsite runoff of surface water, and which is regularly monitored for groundwater quality to the satisfaction of the RWQCB, are conditionally exempt from this Order."

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SOLID WASTE DIVISION

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Thank you for the opportunity to comment on the proposed order. We certainly support the protection of water resources. Hopefully, that can be accomplished without too much extra expense to the public. If you have questions about our comments, please contact me via email or call (661) 326-3109.

Sincerely,



Kevin Barnes
Solid Waste Manager